

# Exhibit C

**Daniel McFadden**

---

**From:** Le, Huy M. (CIV) <Huy.M.Le2@usdoj.gov>  
**Sent:** Friday, December 13, 2019 4:37 PM  
**To:** Daniel McFadden  
**Subject:** RE: Perm Injunction Extension

Dan,

Understood. Have a great weekend.

Best,  
Huy

---

**From:** Daniel McFadden <Dmcfadden@aclum.org>  
**Sent:** Friday, December 13, 2019 4:21 PM  
**To:** Le, Huy M. (CIV) <hule@CIV.USDOJ.GOV>  
**Subject:** RE: Perm Injunction Extension

Huy,

Thank you for your email. As you note, pursuant to the first paragraph of the “both classes” Permanent Injunction, the bond procedures required by the Declaration are already in effect. There is no basis to extend the effective date of those procedures after it has already passed.

If this is how you choose to proceed, please indicate our opposition to your motion in its entirety.

Regards,  
Dan McFadden

---

**Dan McFadden**

Pronouns: he, him, his

Staff Attorney  
American Civil Liberties Union Foundation of Massachusetts  
211 Congress Street, Boston, MA 02110  
617.482.3170 x171 | [dmcfadden@aclum.org](mailto:dmcfadden@aclum.org)  
[aclum.org](http://aclum.org)



---

**From:** Le, Huy M. (CIV) [<mailto:Huy.M.Le2@usdoj.gov>]  
**Sent:** Friday, December 13, 2019 4:00 PM  
**To:** Daniel McFadden <[Dmcfadden@aclum.org](mailto:Dmcfadden@aclum.org)>  
**Subject:** Perm Injunction Extension

Hi Dan,

Thanks for the phone call earlier today. On second thought, we will indeed be moving to extend the first paragraph of the perm injunction (both classes) as well. I understand that it is already in effect but we will still be moving forward with our request. I further understand that you have already objected to this over the phone.

Thank you.

Regards,

Huy M. Le  
Trial Attorney  
United States Department of Justice  
Office of Immigration Litigation - District Court Section  
P.O. Box 868, Ben Franklin Station  
Washington, D.C. 20044  
Tel/Direct: (202) 353-4028 | Fax: (202) 305-7000  
[Huy.M.Le2@usdoj.gov](mailto:Huy.M.Le2@usdoj.gov)

This document (including attachments) may contain confidential and/or sensitive attorney/client privileged information or attorney work product and is not for release, review, retransmission, dissemination or use by anyone other than the intended recipient. Please notify the sender if this email has been misdirected and immediately destroy all originals and copies. Any disclosure of this document must be approved by the U.S. Department of Justice, Civil Division. This document is for INTERNAL GOVERNMENT USE ONLY. FOIA exempt under 5 U.S.C. § 552(b)(5).